

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEW MEXICO

STATE OF NEW MEXICO, *ex rel.*  
State Engineer

Plaintiff,

v.

ROMAN ARAGON, *et al.*,

Defendants.

69cv07941-MV/KK

RIO CHAMA STREAM SYSTEM

Section 1: Rio del Oso & Rio  
Vallecito

Subfile No.: CHRO-002-0001

**APPLICATION FOR ENTRY OF DEFAULT IN SUBFILE NO. CHRO-002-0001**

COMES NOW the plaintiff State of New Mexico, *ex rel.* State Engineer, and requests the Clerk of Court, pursuant to Federal Rules of Civil Procedure Rule 55(a), to enter the default of each the following named defendants for failure to answer or otherwise plead. The undersigned certifies that no answer, appearance, or other pleading has been served upon the plaintiff's attorneys.

**Defendants**

ISABEL W. TRUJILLO  
VIRIGL F. TRUJILLO

**Subfile No.**

CHRO-002-0001

**Return of Service Filed**

August 5, 2016 (Doc. 11131)

Respectfully submitted,

/s/ Felicity Strachan

FELICITY STRACHAN

*Attorney for Plaintiff State of New Mexico*

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**Certificate of Service**

I certify that on September 20, 2019, I filed the foregoing electronically through the CM/ECF system which caused the parties on the electronic service list, as more fully set forth in the Notice of Electronic Filing, to be served via electronic mail.

Additionally, I caused to be mailed a Court-stamped copy of this Application to Isabel W. Trujillo and Virgil F. Trujillo at the following address:

P.O. Box 187  
Abiquiu, NM 87510

/s/ Felicity Strachan  
FELICITY STRACHAN